

From: Green, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BF88FE211E344A94B322C29A7755D44C-MGREEN10]
Sent: 1/29/2020 5:38:08 PM
To: drowe@msank.org; Linda French (linda.french@mottmac.com) [linda.french@mottmac.com]
CC: sefurjanic@pa.gov; Kriley, Christopher [ckriley@pa.gov]
Subject: PA0027111 New Kensington Pretreatment Annual Report Review 2018
Attachments: 2018 Measures.docx; 2018 Instructions.docx; New Kensington 2018.docx

Daniel Rowe
Manager
Municipal Sanitary Authority for the City of New Kensington
120 Logans Ferry Road
New Kensington, Pennsylvania 15068-2046

Re: Industrial Pretreatment Program –2018 Pretreatment Annual Report Reviews NPDES No. PA0027111

Dear Mr. Rowe,

Thank you for submitting the Authority's pretreatment annual report for the 2018 reporting year. Please find my reviews below.

In reviewing the 2018 annual reports, EPA has continued the program in which specific pretreatment implementation items for each approved program are being tracked. For calendar year 2018, no updates were made to the spreadsheet. More detail on exactly how this is done is included in the "Instruction Sheet".

Measure 1 (influent exceedances) is in category 2 for copper and selenium exceedances and category 3 for nickel, zinc exceedances; the Authority failed to submit a priority pollutant scan with the report. Please provide a copy of this and this measure may be amended.

Measure 3 (sludge exceedances) is in category 2 for zinc exceedances and category 3 for nickel exceedances; the Authority failed to submit a priority pollutant scan with the report. Please provide a copy of this and this measure may be amended.

Measure 5 (NPDES permit violations) is in category 2 for a BOD₅ violation that occurred in February of 2018. While the Authority did not indicate the BOD₅ specific violation in their report, they did indicate that no violations were caused by industrial users, therefore category 2 was applied. In future reports please indicate the violations that occurred and whether they were specifically caused by industrial user discharges.

Measures 6 (SIUs in SNC) is in category 3 because two out of five industrial users were in SNC during 2018 (Keystone Rustproofing and Schreiber Industrial Development Company).

Measure 7 (SNC repeat rates) is listed in category 3 based on the ongoing significant noncompliance at Keystone. The Authority needs to carefully monitor the facilities to ensure that they return to and remain in compliance. Enforcement should be escalated if the violations recur; it is probably no longer appropriate to mitigate any penalties. Also, the Authority should ensure that all sampling is being conducted correctly.

Measure 17 (timeliness of responses) is listed in category 3. The Authority initially submitted a draft local limits in May of 2018 but a final was not received until the following year. Therefore timeliness of responses was placed in category 3 due to the lack of timely follow up on submitting a final version.

The overall rating for the Authority in 2018 was 70.4%.

If you have any questions please do not hesitate to contact me.

Best,

Maggie Green

Margaret Green

Environmental Engineer

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